

EXHIBIT A

Nash, Stuart G (WAS - X75158)

From: Nash, Stuart G (WAS - X75158)
Sent: Monday, August 27, 2018 5:32 PM
To: AFryszman@cohenmilstein.com
Subject: Motion to File Sur-Reply

Agnieszka:

Good afternoon. As we had discussed, I am writing to memorialize our telephone conversation from earlier this afternoon.

Based on the representations made in the draft pleading you shared with us earlier today, we are now in a position to appreciate that the issue of when Ms. Tekle first reported to law enforcement her allegations that she was the victim of human trafficking and/or involuntary servitude is an issue of fact, and is therefore not properly the subject of argument in the context of a motion to dismiss. We propose to advise Judge Ellis, at the commencement of the hearing on September 7, that we are withdrawing that aspect of our argument.

Because we are, in effect, conceding your right to the relief that is the subject of your sur-reply, we oppose your motion for leave to file the sur-reply.

Thank you for taking the time to have a meaningful meet and confer today.

Best,

Stuart

Stuart Nash | Holland & Knight

Partner

Holland & Knight LLP

800 17th Street N.W., Suite 1100 | Washington, DC 20006

Phone 202.469.5158 | Fax 202.955.5564

stuart.nash@hklaw.com | www.hklaw.com

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